



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Senior Counsel
Phone: (212) 356-5055
Fax: (212) 356-3509
kweall@law.nyc.gov

March 17, 2020

Honorable Colleen McMahon **VIA ECF**
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Wairon Nunez v. City of New York et al., 18-CV-10522 (CM)

Your Honor:

As the attorney assigned to the defense of the above matter, I respectfully write, with the consent of my adversary, to request a one-month extension of discovery in the above-captioned action, to June 6, 2020. This is the parties' second such request. As it will affect the due date for the pre-trial order in this case, the parties also respectfully request a one-month extension of that date, to July 5, 2020. These requests are not expected to conflict with any other dates.

Since the Court issued its Order of March 6, 2020 extending the parties' time to complete depositions to May 6, 2020, there has been a drastic change in circumstances in that the novel coronavirus pandemic has triggered a state of emergency in both the New York City and New York State. Further, the Mayor has issued an Executive Order directing non-essential City employees to work remotely.

Consequently, in light of the current public health situation and in an effort to engage in social distancing as much as possible, defendants respectfully request that Your Honor postpone the deadline by which the parties are to complete discovery, including depositions, by one month. Defendants assure the Court that they remain committed to moving this case forward as expeditiously as possible, but ask for some leniency in these trying circumstances.

The parties thank the Court for its consideration herein.

Respectfully submitted,

s/ Katherine J. Weall
Katherine J. Weall

cc: Robert Marinelli, Esq.